

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ANDREW PERRONG, individually and on
behalf of a class of all persons and entities
similarly situated,

Plaintiff,

vs.

CAPITAL ENERGY PA LLC D/B/A
SUNRISE POWER & GAS and JOHN DOE
CORPORATION

Defendants.

Case No. 2:21-cv-2982

**STIPULATION OF DISMISSAL WITH PREJUDICE
AS TO CAPITAL ENERGY PA LLC ONLY**

NOW COMES the parties, by and through their respective attorneys, and pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), Plaintiff Andrew Perrong hereby voluntarily dismisses all of his individual claims against Defendant Capital Energy PA LLC only (“Defendant”) in this action with prejudice, each party to pay their own costs. The putative class claims against Defendant are hereby voluntarily dismissed without prejudice, each party to pay their own costs. Moreover, the Plaintiff’s claim against the John Doe Corporation will continue.

Dated: November 9, 2021

Respectfully submitted,

By: /s/ Anthony I. Paronich

Anthony I. Paronich (admitted *pro hac vice*)
PARONICH LAW, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043
Telephone: (508) 221-1510
Email: anthony@paronichlaw.com

Attorney for Plaintiff

By: /s/ John W. McGuinness (with permission)

John W. McGuinness (admitted *pro hac vice*)
A. Paul Heeringa (*pro hac vice* to be requested)
MANATT, PHELPS & PHILLIPS LLP
151 N. Franklin Street, Suite 2600
Chicago, IL 60606
Telephone: (312) 529-6308
Email: jmcguinness@manatt.com
pheeringa@manatt.com

Frederick P. Santarelli
Steven C. Tolliver Jr.
ELLIOTT GREENLEAF, P.C.
925 Harvest Drive, Suite 300
Blue Bell, PA 19422
Telephone: (215) 977-1000
Email: fps@elliottgreenleaf.com
sct@elliottgreenleaf.com

*Attorneys for Defendant Capital Energy PA
LLC d/b/a Sunrise Power & Gas*

CERTIFICATE OF SERVICE

I, hereby certify that on November 9, 2021, I served the foregoing through the Court's CM/ECF system, which sent notice to all counsel of record. I have also sent the document to any party that has not appeared.

/s/ Anthony I. Paronich
Anthony I. Paronich